



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-5

Gregory C. Ehlke, Treasurer
CitiGroup Inc. Political Action Committee
153 East 53rd Street
New York, NY 10043

OCT 8 1999

Identification Number: C00039305

Reference: July Monthly (6/1/99-6/30/99), August Monthly (7/1/99-7/31/99) and
September Monthly (8/1/99-8/31/99) Reports

Dear Mr. Ehlke:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

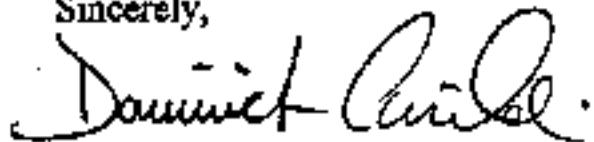
-Your report includes computer produced formats of Schedule A. Computer produced formats may only be used upon prior approval of the Commission. You should submit a separate sample format with a cover letter requesting approval. Until your format has been approved, FEC forms must be used. 11 CFR §104.2(d)

-Schedule A supporting Line 11(a)(i) discloses contributions received through a payroll deduction plan. Generally, a committee's report must identify each contribution from an individual which in the aggregate exceeds \$200 during the calendar year. (2 U.S.C. §434(b)) For your information, instead of separate itemization, a committee using a payroll deduction plan may disclose the aggregate amount of contributions received from the contributor through the payroll deduction plan during the reporting period; the identification of the individual where the contribution exceeds \$200 in the aggregate during the calendar year; and a statement of the amount deducted per pay period. 11 CFR §104.8(b)

Any amendment or clarification should be filed with the Federal Election Commission. If you need assistance, please feel free to contact me on our toll-free

number, (800) 424-9530. My local number is (202) 694-1130.

Sincerely,



Dominick Ciaraldi
Reports Analyst
Reports Analysis Division

PAYROLL DEDUCTIONS

SCHEDULE A UNITEMIZED RECEIPTS

Line receives information
for each employee of the
Committee from Payroll
Report Summary Page
11(a)(ii)

Contributions from Individuals

Any information received from your Payroll and Benefits may not be sold or used by any person for the purpose of advancing contributions in the committee's support of any candidate or issue.

NAME OF COMMITTEE in full:

National Organization PAC 100000001

Line receives information from Payroll and Benefits Report Summary Page 11(a)(ii)	Name of Employee	Date month of year	Amount of Contri- bution or Deduction
1. For Name, address and ZIP Code	National Organization, Inc.	payroll deduction	\$50.00
Anne Sullivan 211 18th Street City, State ZIP	Employee Branch Manager	(S18 Aggregate Period > 1 205.00)	(biweekly)
Power Cr. — Person — Date Own name:	Vice President	(S20 Aggregate Period > 1 205.00)	(biweekly)

Itemize payroll deductions only after they have exceeded \$200 per calendar year from an individual.

IN-KIND CONTRIBUTIONS

SCHEDULE A UNITEMIZED RECEIPTS

Line receives information
for each employee of the
Committee from Payroll
Report Summary Page
11(a)(ii)

Contributions from Individuals

Any information received from your Payroll and Benefits may not be sold or used by any person for the purpose of advancing contributions in the committee's support of any candidate or issue.

NAME OF COMMITTEE in full:

National Organization PAC 100000001

Line receives information from Payroll and Benefits Report Summary Page 11(a)(ii)	Name of Employee	Date month of year	Amount of Contri- bution or Deduction
1. For Name, address and ZIP Code	National Organization, Inc.	8/19/94	\$3,899.00
Martin L. Kress 4 River Road City, State ZIP	Employee Chairman	(CR-31RD) Aggregate Period > 1 3,899.00	(CR-31RD) PRIZE
Power Cr. — Person — Date Own name:			

SCHEDULE B UNITEMIZED DISBURSEMENTS

Line receives information
for each employee of the
Committee from Payroll
Report Summary Page
21(b)

Operating Expenditures/Other Federal

Any information received from your Payroll and Benefits may not be sold or used by any person for the purpose of advancing contributions in the committee's support of any candidate or issue.

NAME OF COMMITTEE in full:

National Organization PAC 100000001

Line receives information from Payroll and Benefits Report Summary Page 21(b)	Type of Disbursement	Date month of year	Amount of Contri- bution or Deduction
1. For Name, address and ZIP Code	Partial price	8/19/94	\$3,899.00
Martin L. Kress 4 River Road City, State ZIP	Contribution — Person — Date Own name:		(CR-31RD) CONTRIBUTION

Itemize in-kind contributions on both Schedules A and B so as not to inflate the cash-on-hand amount.

Payroll Deductions

Once an individual's deductions aggregate over \$200 in a calendar year, report the total amount deducted from the donor's paychecks during the reporting period on Schedule A. In parentheses indicate the amount that was deducted each pay period. Instead of stating a specific date of receipt, write "payroll deduction" under "Date." The other itemized information, including the year-to-date total, must be completed for each donor. 104.8(b).

EXAMPLE: During an election year, a corporate manager authorizes her employer to deduct \$15 per pay period (each pay period is two weeks) for the company's SSF. The SSF, which files FEC reports on a quarterly schedule, includes the manager's first-quarter contributions (\$90 for six pay periods) as "unitemized contributions" on Line 11(a)(ii) in the April quarterly report.

By June 30 (the closing date for the July quarterly report), 13 pay periods have passed, and the manager's aggregate contributions are \$195—still below the \$200 itemization threshold. The manager's second-quarter contributions again are included in "unitemized contributions" in the July report.

By September 30 (the closing date for the October quarterly report), 19 pay periods have passed, and the manager's contributions reach \$285. Now the committee itemizes the total contributions received from the manager during the third quarter (\$90), providing the year-to-date total in the appropriate space. (See item A in the illustration above.)

In-Kind Contributions

When determining whether to itemize an in-kind contribution, follow the same guidelines listed above under "When to Itemize Receipts." See page 8 for information on how to determine the dollar value of an in-kind contribution.

In addition, add the value of the in-kind contribution to the operating expenditures total on Line 21(b) (in order to avoid inflating the cash-on-hand amount). 104.13(a)(2).

If the in-kind contribution must be itemized on Schedule A, then it must also be itemized on a Schedule B for operating expenditures. See the illustration at right.

